

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

THEODORE E. WRIGHT, III, et al.,

Plaintiffs,

vs.

Case No. 3:12-CV-05120-GAF

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, et al.,**

Defendants.

MOTION TO WITHDRAW AS ATTORNEY OF RECORD

COME NOW Donald M. Brown, K. Patrick Douglas, Nathan A. Duncan and the law firm of Douglas, Haun & Heidemann, P.C., Attorney of Record for Plaintiffs, Theodore E. Wright, II and Sherry O'Neal-Wright, and respectfully request leave of the Court to withdraw as Plaintiff's counsel. In support of this motion, counsel states:

1. Attorneys, Donald M. Brown, K. Patrick Douglas, and Nathan A. Duncan, of the firm of Douglas, Haun & Heidemann, P.C. are the attorneys of record for Plaintiffs herein.
2. Counsel is mindful of the Court's reluctance to grant such motions where there is no assurance of an entry of appearance by substitute counsel. See, L.R. 83.5(o).
3. However, there are grounds to withdraw as Attorney of Record for Plaintiffs in this action under the Rule 4-1.16(b) of the Missouri Rules of Professional Conduct. Such grounds are protected by the attorney-client privilege. Such grounds may be disclosed to the court, *ex parte*, should the Court so require in order to rule upon the merits of this motion.

WHEREFORE, Donald M. Brown, K. Patrick Douglas, Nathan A. Duncan and the law firm of Douglas, Haun & Heidemann, P.C., request an Order of this Court granting leave to withdraw as Attorney of Record for Plaintiffs and for such other relief as the Court deems just and proper.

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By /s/ Nathan A. Duncan

Nathan A. Duncan

Missouri Bar No. 60186

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record. A copy of the foregoing was served on Plaintiff by first-class mail on February 18, 2014.

DOUGLAS, HAUN & HEIDEMANN, P.C.

By /s/ Nathan A. Duncan